

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

| | | |
|--------------------------------------|---|----------------------|
| TERRENCE J. HANCOCK, <i>et al.</i> , |) | |
| |) | |
| Plaintiffs, |) | CIVIL ACTION |
| |) | |
| vs. |) | NO. 08 C 0300 |
| |) | |
| MARLENE'S TRUCKING IL, INC., |) | JUDGE JOAN H. LEFKOW |
| an Illinois corporation, |) | |
| |) | |
| Defendant. |) | |

MOTION FOR ENTRY OF JUDGMENT

Plaintiffs, by and through their attorneys, default having been entered against the Defendant on March 4, 2008, request this Court enter judgment against Defendant, MARLENE'S TRUCKING IL, INC., an Illinois corporation. In support of that Motion, Plaintiffs state:

1. On March 4, 2008, this Court entered default against Defendant and granted Plaintiffs' request for an order directing Defendant to turn over its monthly fringe benefit contribution reports for the time period September 2007 forward. The Court also entered an order that judgment would be entered after the contribution reports were remitted by Defendant to Plaintiff Funds.

2. On March 7, 2008, Plaintiff Funds received Defendant's monthly fringe benefit contribution reports for September 2007 through February 2008. The reports show that the Defendant is delinquent in contributions to the Welfare Fund in the amount of \$1,402.20 and to the Pension Fund in the amount of \$1,094.40. (See Affidavit of Terrence J. Hancock)

3. Additionally, the amount of \$280.44 is due the Welfare Fund for liquidated damages and \$218.88 is due the Pension Fund. (Hancock Aff. Par. 5).

4. In addition, Plaintiffs' firm has expended \$420.00 for costs and \$222.50 for attorneys' fees in this matter. (See Affidavit of Catherine M. Chapman).

5. Based upon the documents attached hereto, Plaintiffs request entry of judgment in the total amount of \$3,638.42.

WHEREFORE, Plaintiffs respectfully request this Court to enter judgment in the amount of \$3,638.42.

/s/ Cecilia M. Scanlon

Cecilia M. Scanlon
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CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that she electronically filed the foregoing document (Motion for Entry of Judgment) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participant on or before the hour of 5:00 p.m. this 8th day of April 2008:

Ms. Regina Zatar, Registered Agent
Marlene's Trucking IL, Inc.
4711 Midlothian Tpk. #11
Crestwood, IL 60445

/s/ Cecilia M. Scanlon _____

Cecilia M. Scanlon
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